

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

TIMOTHY L. HOELLER,

Plaintiff,

v.

Case No. 15-C-1088

JOHN BARRETT, Clerk of Milwaukee
County Circuit Court, KATHLEEN A.
MADDEN, Clerk of Waukesha County
Circuit Court, and DIANE M. FREMGEN,
Clerk of Wisconsin Court of Appeals,

Defendants.

DEFENDANT DIANE FREMGEN'S MOTION TO DISMISS

Defendant Diane M. Fremgen, by Wisconsin Attorney General Brad D. Schimel and Assistant Attorney General David C. Rice, moves the court to enter judgment dismissing this action against her on the grounds of Eleventh Amendment immunity, quasi-judicial immunity, qualified immunity, the *Rooker-Feldman* doctrine or abstention, and failure to state a claim upon which relief can be granted.

Dated at Madison, Wisconsin, this 11th day of September, 2015.

Respectfully submitted,

BRAD D. SCHIMEL
Attorney General

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Assistant Attorney General
State Bar #1014323

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